

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

HOWARD B. SAMUELS, solely as
chapter 7 trustee of the estates of
CENTRAL GROCERS, INC., STRACK
AND VAN TIL SUPER MARKET, INC.
AND SVT, LLC,

Plaintiffs,

v.

CARGILL, INC., JBS USA FOOD
COMPANY HOLDINGS, NATIONAL
BEEF PACKING COMPANY, TYSON
FOODS, INC.,

Defendants.

Case No. 0:20-cv-01319 (JRT/HB)

**DECLARATION OF KARL L. CAMBRONNE IN SUPPORT OF DIRECT PURCHASER
PLAINTIFF'S MOTION TO APPOINT INTERIM CO-LEAD COUNSEL**

I, Karl L. Cambronne, declare as follows:

1. I am a senior partner at the law firm Chestnut Cambronne PA and am licensed to practice law in the State of Minnesota. I am attorney of record for Plaintiff Howard B. Samuels, solely as chapter 7 trustee of the estates of Central Grocers, Inc., Strack and Van Til Super Market, Inc. and SVT, LLC, in the above-captioned matter.

2. I submit this declaration in support of the accompanying Motion of Direct Purchaser Plaintiff to Appoint Interim Co-Lead Counsel. I have personal knowledge of the facts in this declaration and could competently testify to them if called as a witness.

3. Attached hereto as Exhibit A is a proposed letter establishing a time and expense reporting protocol for all Direct Purchaser Plaintiffs' Counsel.

4. Attached hereto as Exhibit B is a true and correct copy of the firm resume for Chestnut Cambronne PA.

5. Attached hereto as Exhibit C is a true and correct copy of the firm resume for Hartley LLP.

6. Attached hereto as Exhibit D is a true and correct copy of the firm resume for Freed Kanner London & Millen LLC.

7. Attached hereto as Exhibit E is a true and correct copy of the firm resume for Hausfeld LLP.

Executed on July 17, 2020, at Minneapolis, Minnesota.

/s/ Karl L. Cambronne
Karl L. Cambronne